

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

WILLIAM A. BROWNLEE, SR.,

Debtor.

Chapter 13

Case No.: 24-10598-pmm

**NOTICE OF APPEARANCE AND  
REQUEST FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that pursuant to Rule 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned, Matthew A. Lipman, Esquire of McElroy, Deutsch, Mulvaney & Carpenter, LLP appears for creditor United Bank of Philadelphia (“United Bank”), and pursuant to Rules 2002(g), 2002(i), and 9007 requests, unless otherwise directed by the Court, that all notices that are required to be given in this case or in any related adversary proceeding, and all papers that are required to be served in this case be given to and served upon the undersigned, at the offices, telephone and facsimile number set forth below:

Matthew A. Lipman, Esq.  
McElroy, Deutsch, Mulvaney & Carpenter, LLP  
1617 John F. Kennedy Blvd., Suite 1500  
Philadelphia, PA 19103  
Phone: (215) 557-2900  
Facsimile: (215) 557-2990  
mlipman@mdmc-law.com

PLEASE TAKE FURTHER NOTICE that request is hereby also made for service of copies of all papers, including but not limited to reports, pleadings, motions, applications or petitions, schedules, plans, disclosure statements (or circulated drafts of any of the foregoing), and answering reply papers filed in the above-captioned case or any related adversary proceeding by mailing one copy of each, unless otherwise directed by the Court to the above address.

PLEASE TAKE FURTHER NOTICE that United Bank does not intend this Notice of Appearance and Request for Notices and Service of Papers, nor any subsequent appearance, pleading, claim, or suit, to waive any rights to which it may be entitled including, but not limited to: (i) its right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) its right to trial by jury in any proceeding related to this case; (iii) its right to have the District Court withdraw the reference in any matter subsequent to mandatory or discretionary withdrawal; or (iv) any rights, claims, actions, defenses, setoffs, or recoupments to which it may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments it expressly reserves.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Notices and Service of Papers does not constitute an agreement to accept services of initial process under Rule 4, Fed. R. Civ. P., or Rule 7004, Fed. R. Bankr. P., nor shall it result in undersigned counsel being deemed to be the agent of United Bank for such purpose.

**McELROY, DEUTSCH, MULVANEY  
& CARPENTER, LLP**

Dated: April 11, 2024

/s/ Matthew A. Lipman

Matthew A. Lipman, Esquire  
1617 John F. Kennedy Blvd., Suite 1500  
Philadelphia, PA 19103  
Telephone: (215) 557-2900  
Facsimile: (215) 557-2990  
E-mail: [mlipman@mdmc-law.com](mailto:mlipman@mdmc-law.com)

*Attorneys for United Bank of Philadelphia*